REMARKS

The Office action has been carefully considered. The Office action rejected claims 1-29 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,266,681 to Guthrie ("Guthrie"). Applicants respectfully disagree.

By present amendment, claims 1, 18, 24, 25, and 29 have been amended for clarification and not in view of the prior art. Applicants submit that the claims as filed were patentable over the prior art of record, and that the amendments herein are for purposes of clarifying the claims and/or for expediting allowance of the claims and not for reasons related to patentability. Reconsideration is respectfully requested.

Applicants thank the Examiner for the interview held (by telephone) on July 19, 2004. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is directed, generally, to a method for handling DHTML (Dynamic HyperText Markup Language) behaviors in web pages. A DHTML behavior is typically characterized as a component associated with an element in a web page, wherein the component encapsulates some additional functionality or "behavior". For example, an element, such as JPEG picture of a balloon, may have an associated DHTML behavior that causes the balloon to move

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upward in the web page when the JPEG picture in clicked. When applied to a standard HTML element on a page, a DHTML behavior component may enhance that element's default behavior.

In the past, a DHTML behavior was merely attached to the respective element. That is, the code representing the behavior was separate (but still associated) with the code representing the element. When a web page was accessed by a browser and subsequently interpreted (element by element), the behavior was not interpreted until instantiated in order to save time and computing power. The behavior component remained attached to an associated element but not executed until some behavior activation condition was met, *i.e.*, left-clicking in the above example.

According to an embodiment of the present invention, however, the DHTML behavior may be bound to an associated element. The code representing the behavior may be intermixed with the code representing the element. When a web page is accessed by a browser and subsequently interpreted (again element by element), the behavior may be instantiated prior to the interpretation of the associated element. Because the behavior component is bound to the element, the behavior component may be interpreted before the element is interpreted so that the element may be presented properly when displayed.

Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

Turning to the claims, amended claim 1 recites in a computer system, a method comprising interpreting a page, the page comprising an import instruction

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that references a behavior component coded in a dynamic hypertext markup language and an element linked to the behavior component; and determining a behavior of the element on the page by instantiating the behavior component in accordance with the import instruction prior to interpreting the element.

The Office action rejected claim 1 as being anticipated by Guthrie. Column 5, lines 14-18, 26-29, and 33-34 of Guthrie have been referenced. Applicants respectfully disagree.

Guthrie teaches, generally, a method and system for injecting code into a web document prior to interpretation. More specifically, the cited and applied section of Guthrie discloses an injector system operable to inject code into an HTML document. When an HTML document is requested by a browser, the injector system "intercepts" the returning HTML document, injects some HTML code into the HTML document in the form of an injectable component, and then passes the modified HTML document to the browser for interpretation in a normal manner. See, generally column 5, lines 13-34. Consequently, the browser is unaware (*i.e.*, the injection is transparent to the browser) of any change to the HTML document and interprets the modified HTML document according to known conventional methods regardless of what HTML code may have been injected.

Guthrie does not disclose a behavior bound to an element as claimed by applicants. Moreover, the system and method in Guthrie is neither concerned with nor even aware of the nature of the injectable component. In fact, the method of the present invention may be practiced in succession to the methods taught by Guthrie. Guthrie does not teach or even suggest the manner of how to interpret

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the modified HTML document once passed to the browser since the injection method is transparent to the browser. Therefore, the modified HTML document will still be interpreted like any other HTML document. That is, the HTML document will be interpreted element by element such that any attached behavior component (DHMTL or otherwise) will only be interpreted when activated.

Furthermore, Guthrie is not even remotely aware of a behavior component that may be coded in a language such as a dynamic hypertext markup language (DHTML). At best, Guthrie teaches inserting components (not behavior components) that may be coded in a standard hypertext markup language (HTML) according to known standards. As such, Guthrie cannot possibly be construed to teach any handling of a behavior component coded in DHTML, nor can Guthrie be construed to disclose the recitations of claim 1 which are clearly patentable over the prior art of record. For at least the foregoing reasons, applicants submit that claim 1 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 2-17, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 1 and consequently includes the recitations of independent claim 1. As discussed above, Guthrie fails to disclose the recitations of claim 1 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 1 noted above, each of these dependent claims includes additional patentable elements.

For example, claim 9 recites that the behavior component comprises content, and wherein instantiating the behavior component comprises inserting the

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content into the page. Guthrie cannot possibly be construed to teach a behavior component that, when instantiated, inserts code. In effect, for claim 9 to read on the prior art, Guthrie would have to disclose that its injectable component is, in turn, a component itself for injecting additional code (or content). Thus, it is counterintuitive to the system of Guthrie to inject code that is operable to inject yet more code. Applicants submit that for at least this additional reason, claim 9 is allowable over the prior art of record.

Turning to the next independent claim, amended claim 18 recites a computer-readable medium having computer-executable instructions comprising interpreting a page to create a document structure, the page comprising an instruction to instantiate a behavior component that is coded in a dynamic hypertext markup language, instantiating the behavior component in accordance with the instruction, instantiation of the behavior component creating a document fragment, and maintaining the document fragment separate from the document structure.

The Office action rejected claim 18 as being anticipated by Guthrie. Again, column 5, lines 14-18, 26-29 and 33-34 of Guthrie have been referenced. Applicants respectfully disagree.

As was discussed above, Guthrie is not even remotely aware of a behavior component that may be coded in a language such as a dynamic hypertext markup language. At best, Guthrie teaches inserting components (not behavior components) that may be coded in a hypertext markup language according to known standards. Consequently, Guthrie cannot possibly be construed to teach

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any handling of a behavior component coded in DHTML, nor can Guthrie be construed to disclose the page comprising an instruction to instantiate a behavior component that is coded in a dynamic hypertext markup language, instantiating the behavior component in accordance with the instruction, instantiation of the behavior component creating a document fragment as recited in claim 18. For at least these reasons, applicants submit that claim 18 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 19-23, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 18 and consequently includes the recitations of independent claim 18. As discussed above, Guthrie fails to disclose the recitations of claim 18 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 18 noted above, each of these dependent claims includes additional patentable elements.

Turning to the next independent claim, amended claim 24 recites a computer-readable medium having computer-executable instructions, comprising linking an element placed in a page to a behavior component, the behavior component coded in a dynamic hypertext markup language and including content therein, interpreting the page to form a document structure, when interpreting the element, instantiating the behavior component to determine a behavior of the element on the page, the behavior including a pointer to the content, instantiating the behavior component to create a document fragment, the document fragment

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maintained separately from the document structure, accessing the content via the pointer, and inserting the content into a representation of the page.

The Office action rejected claim 24 as being anticipated by Guthrie. Once again, column 5, lines 14-18, 26-29 and 33-34 of Guthrie have been referenced. Applicants respectfully disagree.

Again, as was discussed above, Guthrie is not even remotely aware of a behavior component that may be coded in a language such as DHTML. At best, Guthrie teaches inserting components (not behavior components) that may be coded in HTML according to known standards. As such, Guthrie cannot possibly be construed to teach any handling of a behavior component coded in DHTML, nor can Guthrie be construed to disclose the remaining recitations of claim 24. For at least these reasons, applicants submit that claim 24 is allowable over the prior art of record.

Turning to the next independent claim, amended claim 25 recites a computer-readable medium having computer-executable components comprising, a behavior component coded in a dynamic hypertext markup language, an import instruction component in a page, the import instruction configured to call for instantiation of the behavior component during a parsing of the page and further configured to associate the behavior component with the page, and an element in the page that is defined by a behavior of the behavior component and configured such that, during the parsing of the page, the element binds with the behavior component and applies the behavior.

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The Office action rejected claim 25 as being anticipated by Guthrie. Column 5, lines 14-18, 26-29 and 33-34 of Guthrie have been referenced. Applicants respectfully disagree.

Again, as was discussed above, Guthrie is not even remotely aware of a behavior component that may be coded in a language such as DHTML. At best, Guthrie teaches inserting simple components (not behavior components) that may be coded in a HTML according to known standards. As such, Guthrie cannot possibly be construed to teach any handling of a behavior component coded in DHTML, let alone the remaining recitations of claim 25. Applicants submit that claim 25 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 26-28, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 25 and consequently includes the recitations of independent claim 25. As discussed above, Guthrie fails to disclose the recitations of claim 25 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 25 noted above, each of these dependent claims includes additional patentable elements.

Turning to the last independent claim, claim 29 recites a computer-readable medium having computer-executable instructions comprising interpreting a page, the page comprising an instantiation instruction that calls for instantiation of a behavior component, the behavior component coded in a dynamic hypertext markup language and comprising a parsing instruction, and instantiating the behavior component in accordance with the instantiation instruction, the

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instantiation precluded by the parsing instruction from parsing static content in the behavior component.

The Office action rejected claim 29 as being anticipated by Guthrie. As before, column 5, lines 14-18, 26-29 and 33-34 of Guthrie have been referenced. Applicants respectfully disagree.

Once again, as was discussed above, Guthrie is not even remotely aware of a behavior component that may be coded in a language such as DHTML. At best, Guthrie teaches inserting simple components (not behavior components) that may be coded in HTML according to known standards. Consequently, Guthrie cannot possibly be construed to teach any handling of a behavior component coded in DHTML, nor can Guthrie be construed to disclose interpreting a page, the page comprising an instantiation instruction that calls for instantiation of a behavior component, the behavior component coded in a dynamic hypertext markup language and comprising a parsing instruction as recited in claim 29. For at least these reasons, applicants submit that claim 29 is allowable over the prior art of record.

For at least these additional reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office action is respectfully requested and early allowance of this application is earnestly solicited.

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In re Application of MARTINSEN et al.
Serial No. 09/677,445

CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-29 are patentable over the prior art of record, and that the application is in good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,

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